

SONY

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

Docket #07-CV-6376

ROBERT W. MANN, AS TRUSTEE FOR
ROBERT W. MANN RETIREMENT TRUST,
LOTUSBAY, LLC,
LIAN MEI DEVELOPMENT, LLC,
(both incorporated in State of Delaware)
Plaintiffs

JUDGE DANIELS

8/6/07

V.

MICHAEL ROBERT ALEXANDER BROWN,
a/k/a MICHAEL BROWN,
5th AVENUE PARTNERS, LTD., a/k/a FIFTH
AVENUE PARTNERS, LTD.,
5th AVENUE PARTNERS (U.K.), LTD., a/k/a
FIFTH AVENUE PARTNERS, LTD.,
LAMBERHURST DEVELOPMENTS, LTD.,
IDB FOUNDATION,
(all entities incorporated in England and Wales)
DEVONSHIRE CAPITAL, LTD.,
(incorporated in Gibraltar)
5th AVENUE PARTNERS, GMBH, a/k/a
FIFTH AVENUE PARTNERS GMBH
(incorporated in Switzerland)
FIFTH AVENUE PARTNERS, S.L., a/k/a 5th
AVENUE PARTNERS, S.L.
(incorporated in Spain)
5th AVENUE PARTNERS, LTD., a/k/a
FIFTH AVENUE PARTNERS, LTD.
(incorporated in British Virgin Islands)

Defendants

MOTION TO ADMIT COUNSEL
PRO HAC VICE

FILED
U.S. DISTRICT COURT
2007 AUG -8 PM 1:00
S.D. of N.Y.

PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern
District of New York, I, Joshua Bachrach, a member in good standing of the bar of this Court, hereby move for an
Order allowing the admission pro hac vice of

Applicant's Name:	Andrew R. Benedict, Esquire
Firm Name:	Rawle & Henderson LLP
Address:	The Widener Building One South Penn Square
City/State/Zip:	Philadelphia, Pennsylvania 19107
Email Address:	abenedict@rawle.com

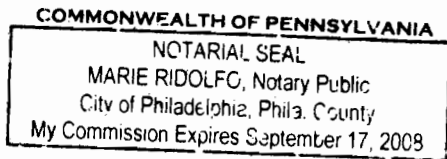
Andrew R. Benedict, Esquire is a member in good standing of the Bar of the States of Pennsylvania

There are no pending disciplinary proceeding against Andrew R. Benedict in any State or Federal Court.

Dated: 8-3-07

City, State: Phila PA

Marie Ridolfi



Respectfully submitted,

Joshua Bachrach

Joshua Bachrach, Esquire
SDNY Bar 565707
Rawle & Henderson LLP
One S. Penn Square, 16th Floor
The Widener Building
Philadelphia, PA 19107
215-575-4200
215-563-2583

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**AFFIDAVIT OF JOSHUA BACHRACH
IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

State of New York)
) ss:
County of New York)

Joshua Bachrach, being duly sworn, hereby deposes and says as follows:

1. I am Joshua Bachrach, counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Andrew R. Benedict as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am admitted to the bar of the United States District Court for the Southern District of New York since August 1999, and am in good standing with this Court.
3. I have known Andrew R. Benedict since December, 2005.
4. Andrew R. Benedict, an attorney at Rawle & Henderson LLP in Philadelphia, Pennsylvania.

5. I have found Andrew R. Benedict to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Andrew R. Benedict, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Andrew R. Benedict, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Andrew R. Benedict, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

Dated: *July 27, 2007*
City, State: *Phila, Penn*

Notarized: *Barbara Nipon*

Respectfully submitted,

Joshua Bachrach

Joshua Bachrach
SDNY Bar Code: JB5707

COMMONWEALTH OF PENNSYLVANIA

NOTARIAL SEAL

BARBARA NIPON, Notary Public

City of Philadelphia, Phila. County

My Commission Expires September 17, 2008



Supreme Court of Pennsylvania

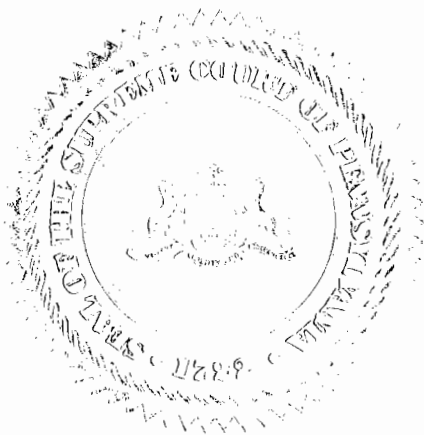
CERTIFICATE OF GOOD STANDING

Andrew Read Benedict, Esq.

DATE OF ADMISSION

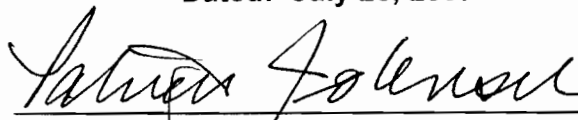
November 20, 2001

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: July 26, 2007


Patricia A. Johnson
Chief Clerk

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

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**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Joshua Bachrach, attorney for Plaintiffs and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	Andrew R. Benedict, Esquire
Firm Name:	Rawle & Henderson LLP
Address:	The Widener Building One South Penn Square
City/State/Zip:	Philadelphia, Pennsylvania 19107
Email Address:	abenedict@rawle.com

is admitted to practice pro hac vice as counsel for Plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case

Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

City, State:

United States District/Magistrate Judge

CERTIFICATION OF SERVICE

I hereby certify that on today's date I served a true and correct copy of the foregoing Motion Pro Hac Vice was served upon the following by international federal express:

Michael Robert Alexander Brown
Avenue Rotgetes 9, Esporles, Mallorca, 07190, Spain

Fifth Avenue Partners Ltd., aka 5th Avenue Partners Ltd.
10 Dominion Street, London, EC2M 2EE, U.K.

Devonshire Capital Ltd.
10 Dominion Street, London, EC2M 2EE, U.K.

Lamberhurst Properties Ltd.
10 Dominion Street, London, EC2M 2EE, U.K.

Fifth Avenue Partners GmbH aka 5th Avenue Partners GmbH
Calle Conquistador 18, Planta Primero, Palma de Mallorca, 07001, Spain

Fifth Avenue Partners S.L., a/k/a 5th Avenue Partners S.L.
Palma 07015, Edificio Reina Constanza, piso 9-B, calle Porto Pi, numero 8, Palma,
Mallorca. Spain Calle Conquistador 18, Planta Primero, Palma de Mallorca, 07001, Spain

5th Avenue Partners Ltd., a/k/a Defendant Fifth Avenue Partners Ltd,
c/o Nerine Trust (BVI) Ltd., P.O. Box 905, Nerine Chambers, 5 Columbus Centre,
Pelican Drive, Road Town, Tortola, BVI

RAWLE & HENDERSON LLP

By: 
Sharon M. Gahagan

Dated: 8/3/07